

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Dr. Chipley Bennett,)	C.A. No.: <u>7:23-cv-02574-JD-KFM</u>
)	
Plaintiff,)	
)	JOINT DISCOVERY PLAN
v.)	
)	
Spartanburg Community College)	
)	
Defendant.)	
_____)	

The parties respectfully submit the following information required by the Federal Rule of Civil Procedure 26(f) and this Court's Scheduling Order. Counsel for the parties participated in a discovery conference on December 14, 2023. This is the discovery plan resulting from that meeting:

DISCOVERY PLAN

(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when disclosures under Rule 26(a)(1) were made or will be made?

RESPONSE: The parties waive Rule 26(a)(1) disclosures.

(B) The subjects on which discovery made be needed, when discovery should be completed, and whether discovery should be conducted in phases or limited to or focused on particular issues.

RESPONSE: Discovery will be conducted on the matters raised in the pleadings. The parties anticipate conducting discovery within the time frame set forth in the Scheduling Order. The parties do not foresee a need for special limitations or phases for discovery.

(C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.

RESPONSE: The parties will default to production in PDF format, but either party may request a native format of a document/file and those requests will be dealt with on a situation-by-situation basis.

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order.

RESPONSE: The parties agree to a claw back of inadvertently produced privilege or work product materials.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed?

RESPONSE: None.

(F) Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c).

RESPONSE: None at this time.

Plaintiff:

DR. CHIPLEY BENNETT

DUNLAEVY LAW FIRM

BY: s/Jeffrey P. Dunlaevy
Jeffrey P. Dunlaevy (#7575)
37 Villa Road, Suite 440
Greenville, South Carolina 29615
Telephone: (864) 208-9305
jeff@dunlaevylaw.com
*Attorney for Plaintiff Dr. Chipley
Bennett*

Spartanburg, South Carolina
January 3, 2024

Defendant:

SPARTANBURG COMMUNITY
COLLEGE

GIBBES BURTON, LLC

BY: s/Stephanie H. Burton
Stephanie H. Burton (#5009)
308 East Saint John Street
Spartanburg, South Carolina 29302
Telephone: (864) 327-5000
sburton@gibbesburton.com
*Attorneys for Defendant Spartanburg
Community College*